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U.S. EPA REGION I
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT SECTION

October 24, 1985

F. D. Hale, Research Manager
O'Brien & Gere Engineers, Inc.
P. O. Box 4873
Syracuse, NY 13221

Subject: Agreement and Administrative Order by Consent
Granite City Site
RI/FS Work Plan (Appendix D - Sampling Plan)

Dear Mr. Hale:

The Remedial Investigation/Feasibility Study (RI/FS) Safety and QA/QC Plans have been the subject of agency comments which were addressed by NL's October 21, 1985 letter and OB&G's October 22, 1985 transmittal of revised plans.

Now that these submittals have been handled, I was able to review your September 30, 1985 request for direction as to how the off-site areas, to where battery cases were reportedly taken, should be considered in OB&G's sampling plan. Unfortunately, upon my initial review of Table 1 in Appendix D to the Work Plan several months ago, I had the impression that the references to Venice Township included "...all known off-site removal areas..." required to be addressed by the Soils and Sediments Investigation that was to be conducted pursuant to Task 3 of the RI. However, upon recent study of an area map, I was surprised to learn that Venice Township includes areas to the south and west of the site that are included within the initial soil study to be conducted within one-half mile of the plant site.

I very much appreciate OB&G's attention to details in this situation, and suggest that your organization prepare supplements to Table 1 and Figure 2 of Appendix D, which will respectively list and locate proposed sampling points in the above-noted off-site areas.

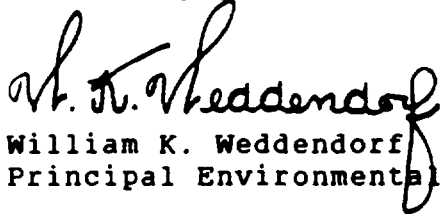
NL Industries, Inc.
Environmental Control Department
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2499

F. D. Hale
O'Brien & Gere Engineers
October 24, 1985
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With respect to the area currently under consideration by the above-noted table and figure, I received the attached letter from Michael G. Burnworth, Esquire, that addresses problems in attaining access to what is believed to be Sampling Point #27. During a telephone conversation with Mr. Burnworth, we arrived at a compromise location, which should involve less of an access problem; it is shown on the attached portion of OB&G's Figure 2. From my review of a report of a September 26, 1985 conversation between Mr. Stephen W. Holt and Mr. Burnworth, it would appear that a similar problem had arisen, and hopefully has been resolved with respect to Sampling Point #32. Please talk directly with Mr. Burnworth at 618/233-4525 in order that all of these possible "problem sites" with respect to access can be resolved and noted in appropriate revisions to Table 1 and Figure 2; these will be submitted to the agencies.

If you have any questions regarding this matter, please telephone me at 609-443-2499.

Very truly yours,

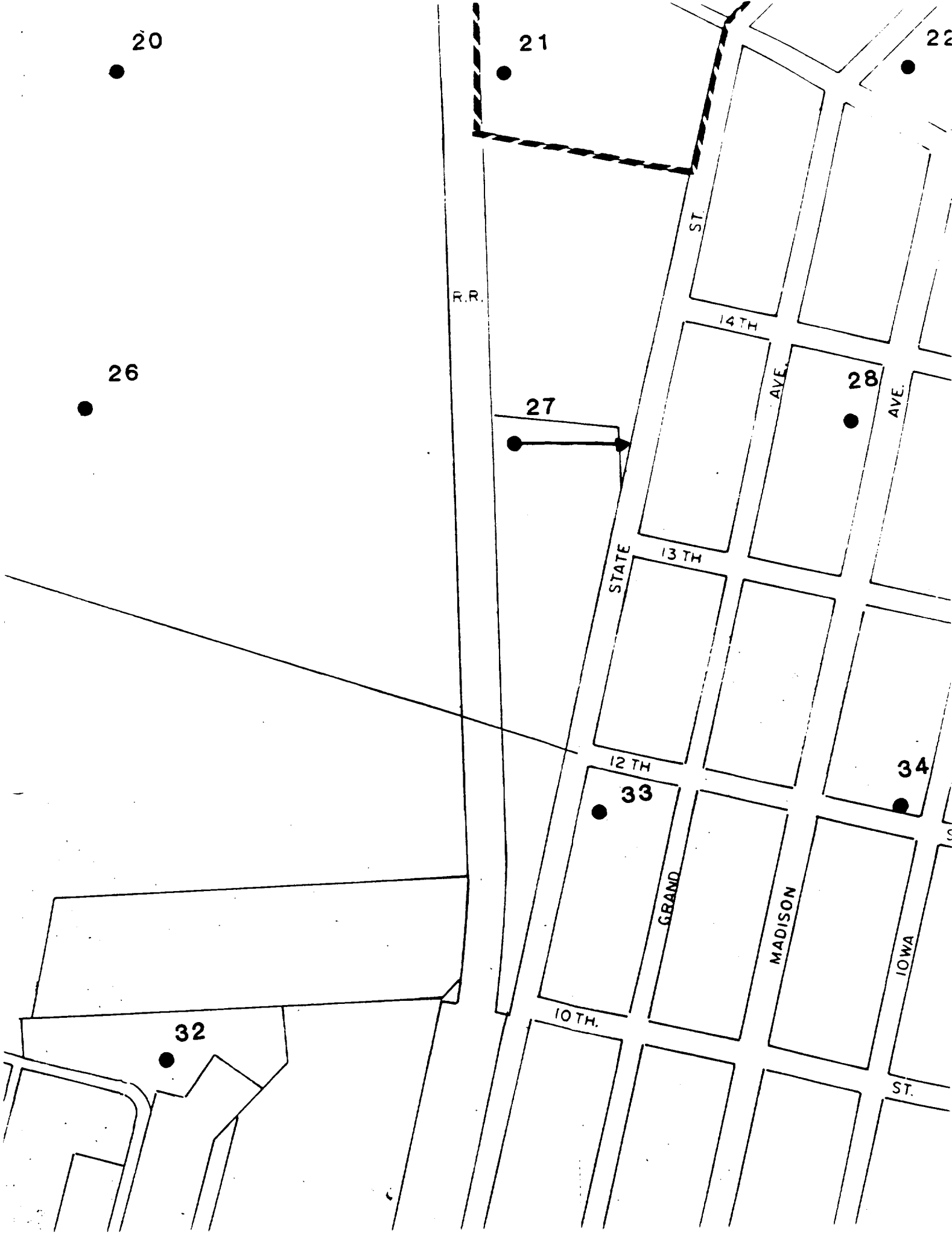


William K. Weddendorf
Principal Environmental Engineer

WKW/dcb

enclosure

cc: M. G. Burnworth - Churchill & McDonnell
Director, Waste Management Division
USEPA, Region V - CERTIFIED MAIL - RRR
Director, Illinois Environmental Protection Agency - CERTIFIED
MAIL - RRR
Deputy Chief, Environmental Control Division
Illinois Attorney General's Office - CERTIFIED MAIL - RRR



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October 15, 1985

Mr. Steve Holt
NL Industries Inc.
1230 Avenue of the Americas
New York, NY 10020

RE: City of Granite City v. NL Industries Inc.

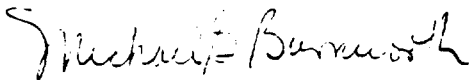
Dear Mr. Holt:

I have received a phone call from Mr. Sheldon Zabel of the Illinois Power Company. He had several questions regarding the sampling. First of all he did request a copy of the sampling results. He also raised a question concerning splitting the samples in order that they may also perform testing for their own purposes. In addition, he would also like to place an indemnity provision in the consent form in order that they would not be liable for any injuries to our people that may occur during the sampling. Finally, Illinois Power would require one of their employees to accompany our sampling people to the testing site due to the fact that this location is utilized as an electrical power substation. Please inform me of your decisions regarding these matters and I will in turn pass them on to Mr. Zabel.

We are now in receipt of approximately one-third of the signed consent forms.

We shall keep you advised of all further progress.

Very truly yours,



Michael G. Burnworth
MGB:pms

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OCT 22 1985

ENVIRONMENTAL
CONTROL

NL Industries, Inc.

P.O. Box 1090, Hightstown, N.J. 08520

NL



RRR

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USEPA, Region V
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